

IN RE LOWER MANHATTAN
DISASTER SITE LITIGATION

21 MC102 (AKH)

NOTICE TO PRODUCE DOCUMENTS
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 34

To: BMS Catastrophe, Inc.
c/o Frank J. Keenan, Esq.
Methfessel & Werbel, PC
450 Seventh Avenue, 14th Floor, Suite 1400
New York, NY 10123
keenan@methwerb.com

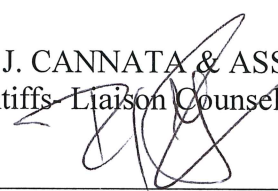
PLEASE TAKE NOTICE, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 1 Liberty Plaza, as referenced in the deposition of John Elliott, dated June 14, 2012, on or about each page listed below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merrill Lextranet.

1. Additional documents regarding job number LS1389 including any contracts, the scope of work performed, dates of work, and exact location of the job site, as referenced on or about page 200 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation.

Dated: New York, New York
February 27, 2013

GREGORY J. CANNATA & ASSOCIATES
Plaintiffs- Liaison Counsel

By: 
Robert A. Grochow, Esq.
233 Broadway, 5th Floor
New York, New York 10279-0003
(212) 553-9205